

REMARKS

The Office Action of February 28, 2005 has been carefully considered. In response thereto, the claims have been amended as set forth above. Reconsideration and allowance in view of the foregoing amendments and the following remarks is respectfully requested.

The Abstract and the Specification have been amended as required. A substitute Declaration is being obtained and will be submitted in due course.

Claims 1-3 and 15-18 were rejected as being anticipated by Higashida. The remaining claims were rejected as being unpatentable over Higashida in view of Biro. Claims 2, 5, 8 and 17 have been cancelled and the subject matter thereof incorporated into claims 1, 4, 7 and 15, respectfully. The rejection of these claims, specifically, is respectfully traversed.


In particular, Higashida is not believed to teach or suggest the feature of when plural data having written into the memory at present are read in a row direction, plural data which is the next to be written are sequentially written in the row direction, on the other hand, when plural data having written into the memory at present are read in a column direction, plural data which is the next to be written are sequentially written in the column direction. This feature allows memory requirements to be dramatically reduced.

Higashida merely teaches the feature of reading out data from memory in a different direction than it was written in order to achieve de-interleaving. For example, if the data was written in a row direction, it is read out in a column direction. Or, if the data was written in a column direction, it is read out in a row direction. In Higashida, for any

particular memory, that memory is consistently written in one direction and read out in a different direction, those directions remaining the same during operation. Higashida therefore does not obtain the advantage of the invention of minimizing memory requirements. As may be clearly observed throughout the figures of Higashida, the memories used for interleaving/de-interleaving are illustrated as being provided in pairs (see, for example, Fig. 15, element 1002, Fig. 18 element 1002, Fig. 21 elements 3000 and 3003, Fig. 26, elements 3000 and 3003, and Fig. 29, elements 3000 and 3003).

Withdrawal of the rejections and allowance of claims 1, 3, 4, 6, 7, 9-16 and 18 is respectfully requested.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M. Ure", is written over a horizontal line.

Michael J. Ure, Reg. 33,089

Dated: May 28, 2005